

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ROTHSCHILD CONNECTED DEVICES
INNOVATIONS, LLC,

Plaintiff,

v .

GUARDIAN PROTECTION SERVICES, INC.

ADS SECURITY, LP

ALARM SECURITY GROUP, LLC

CENTRAL SECURITY GROUP NATIONWIDE, INC.

GUARDIAN ALARM COMPANY

GUARDIAN OF GEORGIA, INC. D/B/A ACKERMAN
SECURITY SYSTEMS

ICON SECURITY SYSTEMS, INC.

MONITRONICS INTERNATIONAL, INC.

SLOMIN'S, INC.

Defendants.

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§ 2:15-cv-01431-JRG-RSP

§ **(Lead Case)**

§ 2:15-cv-01463-JRG-RSP

§ 2:15-cv-01464-JRG-RSP

§ 2:15-cv-01462-JRG-RSP

§ 2:15-cv-01496-JRG-RSP

§ 2:15-cv-01429-JRG-RSP

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§ 2:15-cv-01468-JRG-RSP

§ 2:15-cv-01466-JRG-RSP

§ 2:15-cv-01469-JRG-RSP

JOINT MOTION TO STAY PROCEEDINGS

Defendant ADS Security, L.P. (“ADS”) and Plaintiff Rothschild Connected Devices Innovations, LLC (“Rothschild”) hereby move this Court to stay all deadlines set forth in the Docket Control Order (Dkt. # 50) governing this case. Pending before the Court are Rothschild’s Motion to Dismiss (Dkt. # 58), ADS’s Motion for Judgment on the Pleadings (Dkt. # 23), and ADS’s Motion for Attorneys’ Fees (Dkt. # 59). Defendant ADS has not objected to dismissal of Plaintiff Rothschild without prejudice, but has challenged Rothschild’s motion to dismiss to the extent Rothschild seeks dismissal with prejudice and also to the extent that Rothschild seeks an order that each party bear its own costs.

The pending motions will determinatively resolve this proceeding. The only defendant remaining in the above captioned case is ADS.

Dated: March 4, 2016

Respectfully submitted,

/s/ Nathan J. Bailey

Nathan J. Bailey (TN BPR # 026183)

(lead attorney)

Matthew C. Cox (TN BPR # 028212)

WALLER LANSDEN DORTCH & DAVIS, LLP

Nashville City Center

511 Union Street, Suite 2700

Nashville, TN 37219

Telephone: (615) 244-6380

Facsimile: (615) 244-6804

Nate.Bailey@wallerlaw.com

Matt.Cox@wallerlaw.com

Attorneys for ADS Security, L.P.

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel has complied with the meet and confer requirement in LOCAL RULE CV-7(h). This motion is unopposed.

/s/Nathan J. Bailey

Nathan J. Bailey

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on March 4, 2016 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF filing system per Local Rule CV-5(a)(3).

/s/Nathan J. Bailey

Nathan J. Bailey